

Declaration of J.V.

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

New York Immigration Coalition, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, President of the
United States, in his official capacity, *et al.*,

Defendants.

**CIVIL ACTION NO:
25-cv-01309-MMG**

DECLARATION OF J.V.

I, J.V., upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am more than 18 years of age and competent to testify, upon personal knowledge, to the facts set forth herein.
2. I have temporary housing in Albany County, NY. I am a native of Venezuela.
3. I moved to the United States in 2023 after fleeing from Venezuela. I have Temporary Protected Status (TPS) that is set to expire in April of 2025. I have a current asylum claim pending.

4. My partner, the father of my unborn child, is also a native of Venezuela with TPS set to expire in April of 2025. He has a current asylum claim pending.
5. We are both unable to return to Venezuela because we fear we will be persecuted.
6. Both my partner and I have temporary work authorization. Upon arriving in the United States, I began working as a housecleaner. I stopped working at the end of the 2024 because I felt my health worsening and was worried that continuing to work would negatively impact my pregnancy.
7. I am currently six months pregnant. I am worried that my child will be born stateless as a result of this Executive Order, since there are no Venezuelan embassies or consulates in operation in the United States.
8. I currently receive health insurance through Medicaid. As my Temporary Protected Status is set to expire before my child's birth, I fear that neither I nor my child will have access to long term healthcare upon my child's birth.
9. I feel it is unjust to strip a child born in the United States of U.S. citizenship. It is stressful not knowing if my child will have U.S. citizenship.
10. It is important to me that my child is a U.S. citizen so that they will have a better quality of life and be able to fully engage with all that the United States has to offer.

11. I am worried that participating in this lawsuit as an individual plaintiff will expose me to retaliation by the U.S. government. Specifically, I am concerned that the U.S. government might deny, delay, or interfere with my asylum application because of my participation in this lawsuit.
12. I do not want my participation in this lawsuit to jeopardize my own ability—and, even more importantly, my unborn child's ability—to remain in the United States.
13. I provide this declaration in support of Plaintiffs' motion for a preliminary injunction to enjoin enforcement and implementation of the Executive Order banning birthright citizenship.
14. I am Spanish-language dominant. This document which was prepared in English was translated for me into Spanish. I read and understand its contents.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: March 18, 2025

Respectfully submitted,

A handwritten signature in blue ink, consisting of the letters 'J' and 'V' with a period in between, written in a cursive style.

J.V.